

**STATEMENT OF BASIS (AI No. 148732)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122874 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Eagle Drydock & Marine Repairs, LLC  
P.O. Box 3431  
Houma, LA 70361

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Maxon Graham

**DATE PREPARED:** 5 April 2007

**1. PERMIT STATUS****A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit -** NPDES permit effective date: N/A  
NPDES permit expiration date: N/A  
EPA has not retained enforcement authority.

**C. LPDES permits -** LPDES permit effective date: N/A  
LPDES permit expiration date: N/A

**D. Date Application Received:** 5 February 2007

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - barge repair facility**

Eagle Drydock & Marine Repairs, LLC is a new barge repair facility which will refurbish (cut, weld, blast and paint) deck barges for oilfield service fleets at a rate of about 1 barge per month. This facility is relocating from 408 Bayou DuLarge Road where they are permitted for similar types of discharges. The permit for that site is LA0121983 and will be terminated upon the effective date of this permit. These vessels provide work space for other equipment and carry no products in their holds. This facility will not accept barges with dirty, greasy tops or any bilge water. The fleet barge owner provides paints, solvents, performs the work and takes responsibility for the cleanup of paint waste. This facility will provide the dry dock, air compressor, diesel fuel, sand, propane, and oxygen as needed. These products are stored onshore as needed for repairing barges. The dry dock is a floating barge that is raised and lowered by moving ambient water from Bayou La Carpe into and out of the compartments by submersible electric pumps. The full capacity of the dry dock is 320,000 gallons, however usually about 80,000 is moved to maintain approximately 18 inches of freeboard. Once barges are raised, repairs are done which can include blasting the hull, repainting using red zinc primer and epoxy topcoat. NO barge washing will occur at this facility, and any solids that accumulate on the dry dock are periodically removed from the barge and disposed of off-site.

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**B. FEE RATE**

- |                              |       |
|------------------------------|-------|
| 1. Fee Rating Facility Type: | minor |
| 2. Complexity Type:          | I*    |
| 3. Wastewater Type:          | II    |
| 4. SIC code:                 | 3731  |

\*NOTE\* - the complexity for SIC code 3731 is IV; however, based on the Strategy for Complexity Designation for SIC codes 3731 and 3732, facilities discharging ballast water (dry dock ballast) shall receive a complexity of I.

**C. LOCATION** - 499 Main Port Court, Houma, Terrebonne Parish  
 Latitude 29° 33' 43", Longitude 90° 42' 12"

**3. OUTFALL INFORMATION**

**Outfall 001**

Discharge Type:	dry dock ballast water
Treatment:	none
Location:	at the point of discharge from the dry dock prior to combining with other waters
Flow:	80,000 gpd
Discharge Route:	Directly into Bayou la Carpe

**Outfall 002**

Discharge Type:	dock washwater
Treatment:	none
Location:	at the point of discharge from the dry dock prior to combining with other waters
Flow:	intermittent
Discharge Route:	Directly into Bayou la Carpe

**Outfall 003**

Discharge Type:	Treated sanitary wastewater
Treatment:	aeration
Location:	at the point of discharge from the sewer treatment system
Flow:	400 gpd
Discharge Route:	via local drainage to Bayou la Carpe

**4. RECEIVING WATERS**

STREAM - Houma Navigation Canal via Bayou la Carpe

BASIN AND SEGMENT - Terrebonne Basin, Segment 120509

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

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\* Drinking Water Supply is listed as a designated use of subsegment 120509 (Houma Navigation Canal – Houma to Bayou Pelton). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody per LAC 33:IX.1111.D.

## **5. TMDL STATUS**

Subsegment 120509, Houma Navigation Canal - Houma to Bayou Pelton, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

## **6. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

The facility (AI 80637) is permitted at a different site (LPDES permit LA0121983) and is moving so a new permit is being issued. The new permit will include the additional discharge of treated sanitary wastewater from the land based office at the new facility site.

## **7. COMPLIANCE HISTORY/COMMENTS**

A. Compliance History - No records of compliance actions were found.

B. DMR Review/Excursions - No DMR data were available for review since this is a first time issuance.

## **8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 120509 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

## **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## **11. PUBLIC NOTICES**

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Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Eagle Drydock & Marine Repairs, LLC

**Outfall 001:** the discharge of drydock ballast water from the dry dock (estimated flow is 80,000 gpd).

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2701.1.1.b
COD	---:250	Similar Discharges; BPJ
Oil and Grease	---:15	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

BPJ Best Professional Judgment  
 su Standard Units

**Treatment:** none

**Monitoring Frequency:** All parameters shall be monitored once per discharge. Sampling is only required if a visible sheen is present.

**Limits Justification:** Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

**Outfall 002:** the discharge of dock washwater from dock washing (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u> Mthly Avg:Daily Max (mg/l)	<u>Reference</u>
Visible Sheen	No Presence	Similar Discharges; BPJ

BPJ Best Professional Judgment  
 su Standard Units

**Treatment:** none

**Monitoring Frequency:** Visible Sheen shall be monitored once per discharge event

**Limits Justification:** Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

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**Outfall 003:** treated sanitary wastewater

<u>Pollutant</u>	<u>Limitation</u>		<u>Reference</u>
	Mthly Avg	Weekly Avg	
	(mg/l)		
Flow	Report	Report	LAC 33:IX.2701.1.1.b
BOD <sub>5</sub>	---:45		LAG530000, BPJ
TSS	---:45		LAG530000, BPJ
Fecal Coliform (colonies/100 mL)	---:400		LAG530000, BPJ
pH	6.0 - 9.0	s.u.	LAG530000, BPJ

BPJ Best Professional Judgment  
 s.u. Standard Units

**Treatment:** aeration and chlorination

**Monitoring Frequency:** All parameters for this outfall shall be monitored semi-annually

**Limits Justification:** Limits and Monitoring Frequency are based on LAG530000 and on current guidance for similar discharges from other facilities.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only deck barges are cleaned.

**Storm Water Pollution Prevention Plan (SWP3) Requirement**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3731 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within six(6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).